

**The Dingley Press  
Androscoggin County  
Lisbon, Maine  
A-506-70-H-R/A**

**Departmental  
Findings of Fact and Order  
Part 70 Air Emission License**

After review of the Chapter 140 and Chapter 115 license applications, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, Section 344 and Section 590, the Department finds the following facts:

**I. Registration**

**A. Introduction**

FACILITY	The Dingley Press (Dingley)
LICENSE NUMBER	A-506-70-H-R/A
LICENSE TYPE	Part 70 License Renewal and Chapter 115 Minor Modification
NAICS CODES	323110
NATURE OF BUSINESS	Commercial Lithographic Printing
FACILITY LOCATION	Lisbon, Maine
LICENSE ISSUANCE DATE	October 3, 2006
LICENSE EXPIRATION DATE	October 3, 2011

**B. Emission Equipment**

The following emission units are addressed by this Part 70 License:

EMISSION UNIT ID	UNIT CAPACITY	UNIT TYPE
Pre-press Operations	N/A	Process Equipment
Press #3	1,650 ft/min	Process Equipment <sup>1</sup>
Press #3 Dryers	8.5 MMBtu/hr total	Fuel Burning
Press #4	2,200 ft/min	Process Equipment <sup>1</sup>
Press #4 Dryers	9.2 MMBtu/hr total	Fuel Burning
Press #5	3,000 ft/min	Process Equipment <sup>1</sup>
Press #5 Dryers	5.34 MMBtu/hr total	Fuel Burning
Press #6	1,800 ft/min	Process Equipment <sup>1</sup>
Press #6 Dryers	10.2 MMBtu/hr total	Fuel Burning
Press #7	1,800 ft/min	Process Equipment <sup>1</sup>
Press #7 Dryers	10.2 MMBtu/hr total	Fuel Burning
Press #8	2,500 ft/min	Process Equipment <sup>1</sup>
Press #8 Dryers	11.0 MMBtu/hr	Fuel Burning
Catalytic Incinerator	3.02 MMBtu/hr	Fuel Burning / Pollution Control Equipment

EMISSION UNIT ID	UNIT CAPACITY	UNIT TYPE
RTO #1	9.0 MMBtu/hr	Fuel Burning / Pollution Control Equipment
RTO #2	3.0 MMBtu/hr	Fuel Burning / Pollution Control Equipment
Bindery / Ink Jet Operations	250 – 333 catalogs per min per line	Process Equipment
Air Handler #1 <sup>2</sup>	6.05 MMBtu/hr	Fuel Burning
Air Handler #2 <sup>2</sup>	6.05 MMBtu/hr	Fuel Burning
Cold Cleaning Degreasers (4)	N/A	Misc. Equipment

<sup>1</sup> Unit capacities for process equipment are listed for informational purposes only and are not intended as license restriction.

<sup>2</sup> Indicates equipment not previously licensed.

Dingley has additional insignificant activities which do not need to be listed in the emission equipment table above.

C. Application Classification

The application for Dingley includes the licensing of increased emissions and the installation of new equipment, therefore the license is considered to be a Part 70 License Renewal issued under Chapter 140 and a Minor Modification issued under Chapter 115.

**II. FACILITY AND EMISSION UNIT DESCRIPTION**

A. Process Description

Dingley operates six printing presses and supporting equipment. Each press is a web fed heatset offset lithographic printing press and is comprised of multiple printing units and dryers. Supporting equipment includes pre-press operations, bindery/ink jet printing lines, and cold cleaning degreasers.

In offset lithographic printing the ink in each printing unit is transferred from a lithographic plate to a rubber-covered cylinder and then to the substrate. Once the ink is applied the web is heat dried and chilled before coating with silicone, then cut, folded, and sent to the publication binding lines.

B. Air Handling Units

Dingley operates two natural gas/propane fired air makeup handlers (air handling units #1 and #2) each with a maximum heat input of 6.05 MMBtu/hr. These units were not previously licensed. Therefore, Dingley has requested that this equipment be added to their Part 70 license per the provisions of MEDEP Chapter

115 (minor NSR) and MEDEP Chapter 140. The air handling units are subject to BACT.

Streamlining

1. Opacity
  - a. MEDEP Chapter 101, Section (2)(B)(f) contains an applicable opacity standard.
  - b. BACT establishes an applicable opacity standard.

Dingley accepts streamlining for the opacity standard. The BACT limit is the most stringent and is therefore the only opacity limit included in this license.

2. PM
  - a. MEDEP chapter 103, Section (2)(B)(1)(a) contains an applicable PM lb/MMBtu emission limit.
  - b. BACT establishes an applicable lb/MMBtu emission limit.

Dingley accepts streamlining for the PM lb/MMBtu emission limit. The BACT limit is most stringent and is therefore the only PM lb/MMBtu limit included in this license.

- c. BACT establishes the only applicable PM lb/hr emission limit.  
**No Streamlining Requested.**

3. PM<sub>10</sub>  
BACT establishes the only applicable PM<sub>10</sub> lb/hr emission limit.  
**No Streamlining Requested.**

4. SO<sub>2</sub>  
BACT establishes the only applicable SO<sub>2</sub> lb/hr emission limit.  
**No Streamlining Requested.**

5. NO<sub>x</sub>  
BACT establishes the only applicable NO<sub>x</sub> lb/hr emission limit.  
**No Streamlining Requested.**

6. CO  
BACT establishes the only applicable CO lb/hr emission limit.  
**No Streamlining Requested.**

7. VOC  
BACT establishes the only applicable VOC lb/hr emission limit.  
**No Streamlining Requested.**

Periodic Monitoring

Based on best management practices and the type of fuel for which the air handling units were designed, it is unlikely that they will exceed permitted emission limits. Therefore, periodic monitoring by the source is not required. However, neither the EPA nor the State is precluded from requesting Dingley to perform testing and may take enforcement action for any violations discovered.

Parameter Monitors

There are no Parameter Monitors required for the air handling units.

Control Equipment

There is no add on control equipment required for the air handling units.

C. Pre-press Operations

Dingley operates several pieces of equipment used for pre-press processing including developing film, cleaning film, developing plates, and cleaning plates. These plates are later used on the press line. Dingley also operates a proof machine which allows a single copy proof to be printed out before running the order on the press.

VOCS and HAPS

In a previous license (A-506-71-H-A) a Best Available Control Technology (BACT) analysis was performed on this operation. The Pre-press Operations are therefore exempt from VOC RACT (MEDEP Chapter 134, Section 1.C.2). Based on the relatively small quantity of pollutants, additional control equipment was found not to be economically justified. BACT for the Pre-press Operations was determined to be the continuation of good housekeeping practices.

D. Presses & Dryers

Press #3

Lithographic Printing Press #3, model number L-750, was manufactured by Mitsubishi in 1988 with a nominal process rate of 1,650 ft/min. The raw material that feeds Press #3 are paper, inks, fountain solution, and blanket wash.

The Press #3 dryers are two (2) model OF-4413A dryers manufactured by Thermofoil with a combined heat input of 8.5 MMBtu/hr firing natural gas or propane.

VOC and HAP emissions are controlled by either RTO #1 or RTO #2.

Press #4

Lithographic Printing Press #4, model number L-1100, was manufactured by Mitsubishi in 1995 with a nominal process rate of 2,200 ft/min. The raw material that feeds Press #4 are paper, inks, fountain solution, and blanket wash.

The Press #4 dryers are two (2) Coanda Plus model dryers manufactured by Tec-Systems with a combined heat input of 9.2 MMBtu/hr firing natural gas or propane.

VOC and HAP emissions are controlled by the Catalytic Incinerator.

Press #5

Lithographic Printing Press #5, model number M-3000, was manufactured by Heidelberg Harris in 1999 with a nominal process rate of 3,000 ft/min. The raw material that feeds Press #5 are paper, inks, fountain solution, and blanket wash.

The Press #5 dryers are two (2) model E 121-146 dryers manufactured by Heidelberg Harris with a combined heat input of 5.34 MMBtu/hr firing natural gas or propane.

VOC and HAP emissions are controlled by either RTO #1 or RTO #2.

Press #6

Lithographic Printing Press #6, model number G-14, was manufactured by Baker Perkins in 1988 with a nominal process rate of 1,800 ft/min. The raw material that feeds Press #6 are paper, inks, fountain solution, and blanket wash.

The Press #6 dryers are two (2) model OF-4617 dryers manufactured by Thermo Electron with a combined heat input of 10.2 MMBtu/hr firing natural gas or propane.

VOC and HAP emissions are controlled by either RTO #1 or RTO #2.

Press #7

Lithographic Printing Press #7, model number G-14, was manufactured by Baker Perkins in 1986 with a nominal process rate of 1,800 ft/min. The raw material that feeds Press #7 are paper, inks, fountain solution, and blanket wash.

The Press #7 dryers are two (2) model OF-4617 dryers manufactured by Thermo Electron with a combined heat input of 10.2 MMBtu/hr firing natural gas or propane.

VOC and HAP emissions are controlled by either RTO #1 or RTO #2.

Press #8

Lithographic Printing Press #8, model number GPX-1073, was manufactured by Mitsubishi Heavy Industries in 1997 with a nominal process rate of 2,500 ft/min. The raw material that feeds Press #8 are paper, inks, fountain solution, and blanket wash.

The Press #8 dryers are two (2) model 107144 dryers manufactured by MEGTEC with a combined heat input of 11.0 MMBtu/hr firing natural gas or propane.

VOC and HAP emissions are controlled by either RTO #1 or RTO #2.

**E. Catalytic Incinerator**

Dingley uses a Quantum 7000 Catalytic Incinerator to control VOCs and HAPs from Press #4.

The Catalytic Incinerator shall maintain a minimum destruction efficiency of 95%. Therefore, the Catalytic Incinerator shall maintain a chamber temperature of at least 600°F.

Compliance Assurance Monitoring

The Catalytic Incinerator is used to achieve compliance with a VOC emission limit from Press #4. Pre-control emissions from Press #4 totals greater than 50 ton/year of VOC. Therefore, the Catalytic Incinerator is subject to 40 CFR Part 64, *Compliance Assurance Monitoring* (CAM). (§64.2)

Dingley was required to submit a CAM plan for the Catalytic Incinerator which provided a reasonable assurance of compliance with the VOC emission limits.

The CAM plan monitoring approach for the Catalytic Incinerator included the following:

	<b>Indicator #1</b>
<b>Indicator</b>	Catalytic Incinerator Chamber Temperature
<b>General Criteria</b>	
Measurement Method	Temperature is monitored with a thermocouple.
Indicator Range	Temperature in the chamber is maintained above 600°F. If the temperatures drops below this threshold, the system is shut down until the problem is identified and repairs are completed. The excursion is reported.
<b>Performance Criteria</b>	
Data Representativeness	Thermocouples installed at the chamber exit per manufacturer's design. Thermocouples are accurate to within +/- 10°F.
QA/QC	Inspections of the Catalytic Incinerator, including thermocouples, are performed per the manufacturer's specifications but not less than once per 12 month period.
Monitoring Frequency	Temperatures are measured continuously.
Data Collection Procedure	Temperature is recorded in a log once per shift.
Averaging Period	none

The minimum chamber temperature of 600°F is based on stack testing which demonstrates that compliance with the VOC destruction efficiency will be achieved at this temperature.

The maximum design flow rate for the Catalytic Incinerator is 7,000 scfm. The maximum flow rate from Press #4 is 5,500 scfm. Therefore, monitoring flow rate as an additional indicator was determined not to be necessary since it is not possible for Press #4 to produce a flow rate which exceeds the designed capacity of the Catalytic Incinerator.

### Streamlining

1. Opacity
  - a. MEDEP Chapter 101, Section 2(B)(f) contains an applicable opacity standard.
  - b. BPT establishes an applicable opacity standard.  
[BACT per A-506-74-C-A/R, 11/10/93]

Dingley accepts streamlining for the opacity standard. The BPT limit is the most stringent and is therefore the only opacity limit included in this license.

2. PM
  - a. MEDEP Chapter 103, Section 2(B)(1)(a) establishes the only applicable PM lb/MMBtu emission standard. **No Streamlining Requested.**
  - b. BPT establishes the only applicable PM lb/hr emission limit. [BACT per A-506-74-C-A/R, 11/10/93] **No Streamlining Requested.**
3. PM<sub>10</sub>

BPT establishes the only applicable PM<sub>10</sub> lb/hr emission limit. [BACT per A-506-74-C-A/R, 11/10/93] **No Streamlining Requested**
4. SO<sub>2</sub>

BPT establishes the only applicable SO<sub>2</sub> lb/hr emission limit. [BACT per A-506-74-C-A/R, 11/10/93] **No Streamlining Requested**
5. NO<sub>x</sub>

BPT establishes the only applicable NO<sub>x</sub> lb/hr emission limit. [BACT per A-506-74-C-A/R, 11/10/93] **No Streamlining Requested**
6. CO

BPT establishes the only applicable CO lb/hr emission limit. [BACT per A-506-74-C-A/R, 11/10/93] **No Streamlining Requested**
7. VOC

BPT establishes a destruction efficiency limit for VOC. This is the only applicable VOC limit for this equipment. [BPT per A-506-70-A-I] **No Streamlining Requested**

Periodic Monitoring

Periodic monitoring shall consist of the following:

Item to be monitored	Record
Temperature of Catalytic Incinerator Chamber	continuously

Dingley shall stack test the Catalytic Incinerator for VOCs in accordance with 40 CFR Part 60, Appendix A, Method 25A by December 31, 2007 and every two years thereafter.

Based on best management practices and the type of fuel for which the Catalytic Incinerator was designed, it is unlikely that it will exceed permitted emission limits. Therefore, periodic monitoring by the source for opacity, PM, SO<sub>2</sub>, NO<sub>x</sub>, and CO is not required. However, neither the EPA nor the State is precluded



from requesting Dingley to perform testing and may take enforcement action for any violations discovered.

Parameter Monitors

There are no Parameter Monitors required for the Catalytic Incinerator.

F. RTO #1 and RTO #2

Dingley uses a Wolverine RTO-25,000 regenerative thermal oxidizer (RTO #1) and a TANN Corporation Model TR 2094 regenerative thermal oxidizer (RTO #2) to control VOCs from Presses #3, #5, #6, #7, and #8.

Emissions from all presses (except Press #4) can be controlled by either RTO #1 or RTO #2. Each press is assigned a flow rate based on maximum operation. The presses all vent to a common header. When both RTOs are operating, there is sufficient capacity to control all presses at maximum production. In the event that one of the RTOs goes down, each RTO has programmed interlocks which prohibit presses with a combined total flow rate greater than the RTO design maximum to operate. The interlocks shut down presses based on a preprogrammed priority system. Dingley shall maintain records which demonstrate which presses are in operation for all periods of time when only one RTO is operating.

RTO #1 and RTO #2 shall each maintain a minimum destruction efficiency of 97.5%. Therefore, RTO #1 and RTO #2 shall each maintain a chamber temperature of at least 1300°F.

Compliance Assurance Monitoring

RTO #1 and RTO #2 are used to achieve compliance with VOC emission limits from Presses #3, #5, #6, #7, and #8. Pre-control emissions from these presses total greater than 50 ton/year of VOC. Therefore, RTO #1 and RTO #2 are subject to 40 CFR Part 64, *Compliance Assurance Monitoring* (CAM). (§64.2)

Dingley was required to submit a CAM plan for RTO #1 and RTO #2 which provided a reasonable assurance of compliance with the VOC emission limits.

The CAM plan monitoring approach for RTO #1 and RTO #2 included the following:

	<b>Indicator #1</b>	<b>Indicator #2</b>	<b>Indicator #3</b>
<b>Indicator</b>	RTO #1 Chamber Temp.	RTO #2 Chamber Temp.	Maximum Potential Gas Flow Rate
<b>General Criteria</b>			
Measurement Method	Temperature is monitored with a thermocouple.	Temperature is monitored with a thermocouple.	A hand written or computer generated list of which presses are in operation kept for all instances of RTO downtime.
Indicator Range	Temperature in the chamber is maintained above 1300°F. If the temperatures drops below this threshold, the system is shut down until the problem is identified and repairs are completed. The excursion is reported.	Temperature in the chamber is maintained above 1300°F. If the temperatures drops below this threshold, the system is shut down until the problem is identified and repairs are completed. The excursion is reported.	For instances when only one RTO is operational, the total maximum flow rate from the operating presses should not exceed the maximum design flow rate of the operational RTO. If the total maximum flow rate of the operating presses exceeds the maximum capacity of the operational RTO, presses are shut down until this requirement is met. The excursion is reported.
<b>Performance Criteria</b>			
Data Representativeness	Thermocouples installed in the chamber per manufacturer's design. Thermocouples are accurate to within +/- 10°F.	Thermocouples installed in the chamber per manufacturer's design. Thermocouples are accurate to within +/- 10°F.	By using the maximum design flow from the presses, the total flow to the RTO is conservatively overestimated.
QA/QC	Inspections of the RTO, including thermocouples, are performed per the manufacturer's specifications, but not less than once per 12 month period.	Inspections of the RTO, including thermocouples, are performed per the manufacturer's specifications, but not less than once per 12 month period.	If the records are collected electronically, annual inspections of the data collection system shall be performed.
Monitoring Frequency	Temperatures are measured continuously. (Minimum of once per 15 minutes)	Temperatures are measured continuously. (Minimum of once per 15 minutes)	The list of presses in operation is kept for all instances of RTO downtime. During that time, the list shall be updated continuously. (Minimum of once per 15 minutes)
Data Collection Procedure	Temperature is recorded continuously on a chart recorder with a minimum sensitivity of <10°F.	Temperature is recorded continuously on a chart recorder with a minimum sensitivity of <10°F.	The list of presses in operation is kept either by manual entry or by automated data collection.
Averaging Period	none	none	none

The minimum chamber temperature of 1300°F is based on stack testing which demonstrates that compliance with the VOC destruction efficiency will be achieved at this temperature.

Streamlining

1. Opacity
  - a. MEDEP Chapter 101, Section 2(B)(f) contains an applicable opacity standard.
  - b. BPT establishes an applicable opacity standard.  
[BACT per A-506-70-F-A, 9/17/04]

Dingley accepts streamlining for the opacity standard. The BPT limit is the most stringent and is therefore the only opacity limit included in this license.

2. PM
  - a. MEDEP Chapter 103, Section 2(B)(1)(a) establishes the only applicable PM lb/MMBtu emission standard. **No Streamlining Requested.**
  - b. BPT establishes the only applicable PM lb/hr emission limits.  
[RTO #1: BACT per A-506-71-H-A, 1/13/98]  
[RTO #2: BACT per A-506-70-F-A, 9/20/04]  
**No Streamlining Requested.**
3. PM<sub>10</sub>

BPT establishes the only applicable PM<sub>10</sub> lb/hr emission limits.  
[RTO #1: BACT per A-506-71-H-A, 1/13/98]  
[RTO #2: BACT per A-506-70-F-A, 9/20/04]  
**No Streamlining Requested.**
4. SO<sub>2</sub>

BPT establishes the only applicable SO<sub>2</sub> lb/hr emission limits.  
[RTO #1: BACT per A-506-71-H-A, 1/13/98]  
[RTO #2: BACT per A-506-70-F-A, 9/20/04]  
**No Streamlining Requested.**
5. NO<sub>x</sub>

BPT establishes the only applicable NO<sub>x</sub> lb/hr emission limits.  
[RTO #1: BACT per A-506-71-H-A, 1/13/98]  
[RTO #2: BACT per A-506-70-F-A, 9/20/04]  
**No Streamlining Requested.**

6. CO

BPT establishes the only applicable CO lb/hr emission limits.  
[RTO #1: BACT per A-506-71-H-A, 1/13/98]

[RTO #2: BACT per A-506-70-F-A, 9/20/04]

**No Streamlining Requested.**

7. VOC

BPT establishes a destruction efficiency limit for VOC. This is the only applicable VOC limit for this equipment. [BACT per A-506-70-F-A, 9/20/04]

**No Streamlining Requested**

Periodic Monitoring

Periodic monitoring shall consist of the following:

Item to be monitored	Record
RTO #1 Chamber Temperature	continuously
RTO #2 Chamber Temperature	continuously
Maximum Gas Flow Rate	continuously for all periods of RTO downtime

Dingley shall stack test RTO #1 and RTO #2 for VOCs in accordance with 40 CFR Part 60, Appendix A, Method 25A by September 30, 2007 and every two years thereafter.

Based on best management practices and the type of fuel for which the RTOs were designed, it is unlikely that they will exceed permitted emission limits. Therefore, periodic monitoring by the source for opacity, PM, SO<sub>2</sub>, NO<sub>x</sub>, and CO is not required. However, neither the EPA nor the State is precluded from requesting Dingley to perform testing and may take enforcement action for any violations discovered.

Parameter Monitors

There are no Parameter Monitors required for RTO #1 and RTO #2.

G. Bindery/Inkjet Operations

Once the material has been printed on one of the presses at Dingley, it is conveyed to an ink jet printing process. In this process names, addresses, and other information is printed on the cover of the publications. Dingley uses both methanol based ink and ink containing methyl ethyl ketone (MEK).

All but two of the methanol based printers use Quad Tech SRS-E100 solvent recovery units. BACT for the MEK based units (A-506-70-C-M, 7/10/02) determined that no recovery units were commercially available for that equipment.

In previous licenses BACT analysis were performed on these operations (A-506-71-H-A, 1/13/98 and A-506-70-C-M, 7/10/02). The Ink Jet Operations are therefore exempt from VOC RACT (MEDEP Chapter 134, Section 1.C.2). BACT for the Ink Jet Operations was found to be the continued use of solvent recovery systems where applicable and good housekeeping practices.

#### H. Degreaser Unit

Dingley operates multiple degreasers. Each of these units uses solvents to clean metal parts and is subject to MEDEP Chapter 130. Dingley may add/subtract degreasers without applying for a license amendment provided it files the requisite initial certification with MEDEP as provided in Chapter 130.

##### Periodic monitoring

Periodic monitoring for the degreaser units shall consist of recordkeeping including records of solvent added and removed.

#### I. Facility Emissions

**Total Licensed Annual Emission for the Facility**  
**Tons/year**  
(used to calculate the annual license fee)

	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>VOC</b>	<b>Single HAP</b>	<b>Total HAP</b>
Catalytic Incinerator	0.4	0.4	0.1	9.4	2.4	--	--	--
RTO #1	1.3	1.3	1.3	13.6	17.1	--	--	--
RTO #20.1	0.5	0.5	0.1	12.3	5.1	--	--	--
Air Handling Units	1.3	1.3	0.1	2.6	2.2	--	--	--
Facility Wide Limit	--	--	--	--	--	94.4	9.9	24.9
<b>Total TPY</b>	<b>3.5</b>	<b>3.5</b>	<b>1.6</b>	<b>37.9</b>	<b>26.8</b>	<b>94.4</b>	<b>9.9</b>	<b>24.9</b>

### **III. AIR QUALITY ANALYSIS**

According to Chapter 140 of the Department's regulations, an existing Part 70 source shall be exempt from an impact analysis with respect to a regulated pollutant whose allowable emissions do not exceed the following:

<u>Pollutant</u>	<u>Tons/year</u>
PM	25
PM <sub>10</sub>	25
SO <sub>2</sub>	50
NO <sub>x</sub>	100
CO	250

Based on facility license allowed emissions, Dingley is below the emissions level required for modeling and monitoring.

### **ORDER**

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this sources:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License A-506-70-H-R/A pursuant to MEDEP Chapter 140 and the preconstruction permitting requirements of MEDEP Chapter 115 and subject to the standard and special conditions below.

All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to Dingley pursuant to the Department's preconstruction permitting requirements in Chapters 108 or 115 have been incorporated into this Part 70 license, except for such conditions that MEDEP has determined are obsolete, extraneous or otherwise environmentally insignificant, as explained in the findings of fact accompanying this permit. As such the conditions in this license supercede all previously issued air license conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in Chapter 115 for making such changes and pursuant to the applicable requirements in Chapter 140.

For each standard and special condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only.**

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

## STANDARD STATEMENTS

- (1) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both; [MEDEP Chapter 140]
- (2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege; [MEDEP Chapter 140]
- (3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable. [MEDEP Chapter 140]
- (4) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license; [MEDEP Chapter 140]
- (5) Notwithstanding any other provision in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [MEDEP Chapter 140]
- (6) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:
  - A. Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or
  - B. The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not

applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section or any Part 70 license shall alter or effect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to Section 114 of the CAA.

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in an application dated August 2005.

	SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
A	Facility	MEDEP Chapter 123	Paper Coating Regulation	No equipment applicable to Chapter 123
B	Facility	MEDEP Chapter 126	Capture Efficiency Test Procedures	No equipment applicable to Chapter 123; therefore no equipment subject to Chapter 126
C	Facility	MEDEP Chapter 132	Graphic Arts-Rotogravure and Flexography	Facility has only lithographic printing presses
D	Facility	MEDEP Chapter 134	VOC RACT	Emission sources which have not been subjected to BACT total less than 40 ton of VOCs per year
E	Facility	40 CFR Part 60, Subpart QQ	Graphic Arts Industry: Publication Rotogravure Printing	Facility has only lithographic printing presses
F	Facility	40 CFR Part 63, Subpart KK	Emission Standards for the Printing and Publishing Industry	Facility is not a major source of HAPS and operates only lithographic printing presses

[MEDEP Chapter 140]

- (7) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:
- A. Additional Applicable requirements under the CAA become applicable to a Part 70 major source with a remaining Part 70 license term of 3 or more years. However, no opening is required if the effective date of the requirement is



later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to Chapter 140;

- B. Additional requirements (including excess emissions requirements) become applicable to a Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;
- C. The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 license; or
- D. The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.

[MEDEP Chapter 140]

- (8) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading and other similar programs or processes for changes that are provided for in the Part 70 license. [MEDEP Chapter 140]

#### **STANDARD CONDITIONS**

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions and this license (Title 38 MRSA §347-C);
- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 140; [MEDEP Chapter 140]
- (3) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive

dust, and shall submit a description of the program to the Department upon request; [MEDEP Chapter 140]

**Enforceable by State-only**

- (4) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 MRSA §353.

- (5) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions; [MEDEP Chapter 140]

**Enforceable by State-only**

- (6) The licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license; [MEDEP Chapter 140]

- (7) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, the filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license. [MEDEP Chapter 140]

- (8) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:

A. perform stack testing under circumstances representative of the facility's normal process and operating conditions:

1. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions;
2. to demonstrate compliance with the applicable emission standards; or
3. pursuant to any other requirement of this license to perform stack testing.

- B. install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
  - C. submit a written report to the Department within thirty (30) days from date of test completion.  
[MEDEP Chapter 140]  
**Enforceable by State-only**
- (9) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates emissions in excess of the applicable standards, then:
- A. within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and
  - B. the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and
  - C. the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.  
[MEDEP Chapter 140]  
**Enforceable by State-only**
- (10) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license.
- A. The licensee shall notify the Commissioner within 48 hours of a violation of any emission standard and/or a malfunction or breakdown in any component part that causes a violation of any emission standard, and shall report the

probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;

- B. The licensee shall submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component part causes a violation of any emission standard, together with any exemption requests.

Pursuant to 38 MRSA § 349(9), the Commissioner may exempt from civil penalty an air emission in excess of license limitations if the emission occurs during start-up or shutdown or results exclusively from an unavoidable malfunction entirely beyond the control of the licensee and the licensee has taken all reasonable steps to minimize or prevent any emission and takes corrective action as soon as possible. There may be no exemption if the malfunction is caused, entirely or in part, by poor maintenance, careless operation, poor design or any other reasonably preventable condition or preventable equipment breakdown. The burden of proof is on the licensee seeking the exemption under this subsection.

- C. All other deviations shall be reported to the Department in the facility's semiannual report.  
[MEDEP Chapter 140]

- (11) Upon the written request of the Department, the licensee shall establish and maintain such records, make such reports, install, use, and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [MEDEP Chapter 140]
- (12) The licensee shall submit semiannual reports of any required periodic monitoring. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. [MEDEP Chapter 140]
- (13) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequently if specified in the applicable requirement or by the Department. The compliance certification shall include the following:
- (a) The identification of each term or condition of the Part 70 license that is the basis of the certification;
  - (b) The compliance status;
  - (c) Whether compliance was continuous or intermittent;

- (d) The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
- (e) Such other facts as the Department may require to determine the compliance status of the source;  
[MEDEP Chapter 140]

### **SPECIAL CONDITIONS**

#### **(14) Air Handling Units #1 and #2**

- A. Dingley shall fire only natural gas or propane in air handling units #1 and #2.  
[MEDEP Chapter 115, BACT] **Enforceable by State-only**
- B. Emissions from air handling units #1 and #2 shall each not exceed the following limits:

<b>Pollutant</b>	<b>Lb/MMBtu</b>	<b>Origin and Authority</b>	<b>Enforceability</b>
PM	0.05	MEDEP Chapter 115, BACT	Federally Enforceable

<b>Pollutant</b>	<b>lb/hr</b>	<b>Origin and Authority</b>	<b>Enforceability</b>
PM	0.30	MEDEP Chapter 115, BACT	Federally Enforceable
PM <sub>10</sub>	0.30	MEDEP Chapter 115, BACT	Federally Enforceable
SO <sub>2</sub>	0.01	MEDEP Chapter 115, BACT	Federally Enforceable
NO <sub>x</sub>	0.59	MEDEP Chapter 115, BACT	Federally Enforceable
CO	0.49	MEDEP Chapter 115, BACT	Federally Enforceable
VOC	0.03	MEDEP Chapter 115, BACT	Federally Enforceable

- C. Dingley shall operate air handling units #1 and #2 such that the visible emissions from each does not exceed 10% opacity on a six (6) minute block average basis. [MEDEP Chapter 115, BACT]

#### **(15) Printing Presses**

- A. Dingley is licensed to operate Printing Presses #3, #4, #5, #6, #7, and #8 and the associated dryers. [MEDEP Chapter 140, BPT]
- B. Dingley shall fire only natural gas or propane in the dryers, catalytic oxidizer, RTO #1, and RTO #2. [MEDEP Chapter 140 BPT]  
**Enforceable by State-only**

C. Emissions from the dryers on Press #4 shall be controlled by the catalytic incinerator. [A-506-74-C-A/R (11/10/93), BACT]

D. Emissions from the catalytic incinerator shall not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.12	MEDEP, Chapter 103, Section 2(B)(1)(a)	Federally Enforceable

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	0.08	A-506-74-C-A/R (11/10/93), BACT	Federally Enforceable
PM <sub>10</sub>	0.08	A-506-74-C-A/R (11/10/93), BACT	Federally Enforceable
SO <sub>2</sub>	0.01	A-506-74-C-A/R (11/10/93), BACT	Federally Enforceable
NO <sub>x</sub>	2.15	A-506-74-C-A/R (11/10/93), BACT	Federally Enforceable
CO	0.54	A-506-74-C-A/R (11/10/93), BACT	Federally Enforceable

E. Emissions from Press #4 shall vent to a catalytic incinerator that will achieve 95% destruction of VOCs from the dryers. Compliance shall be demonstrated by stack testing by September 26, 2007 and once every two years thereafter. After two sets of successful compliance demonstrations, Dingley may apply to reduce the frequency of stack testing required. [A-506-74-C-A/R (11/10/93), BACT]

F. The catalytic incinerator shall maintain a temperature of at least 600°F to ensure destruction of the VOCs. Compliance shall be demonstrated by thermocouples maintained in the incinerator chambers. The catalytic incinerator control system is equipped with interlocks which shut down the presses if the temperature drops below 600°F. The Temperature shall be recorded once per shift by operators. [A-506-74-C-A/R (11/10/93), BACT]

G. Emissions from the dryers on Presses #3, #5, #6, #7, and #8 shall be vented through either RTO #1 or RTO#2. [A-506-70-F-A (9/17/04), BACT]

H. Emissions from RTO#1 shall not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.12	MEDEP, Chapter 103, Section 2(B)(1)(a)	Federally Enforceable

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	0.5	A-506-70-B-A (11/27/01), BACT	Federally Enforceable
PM <sub>10</sub>	0.5	A-506-70-B-A (11/27/01), BACT	Federally Enforceable
SO <sub>2</sub>	0.4	A-506-70-B-A (11/27/01), BACT	Federally Enforceable
NO <sub>x</sub>	6.2	A-506-70-B-A (11/27/01), BACT	Federally Enforceable
CO	5.7	A-506-70-B-A (11/27/01), BACT	Federally Enforceable

I. Emissions from RTO#2 shall not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.12	MEDEP, Chapter 103, Section 2(B)(1)(a)	Federally Enforceable

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	0.1	A-506-70-F-A (9/17/04), BACT	Federally Enforceable
PM <sub>10</sub>	0.1	A-506-70-F-A (9/17/04), BACT	Federally Enforceable
SO <sub>2</sub>	0.01	A-506-70-F-A (9/17/04), BACT	Federally Enforceable
NO <sub>x</sub>	2.8	A-506-70-F-A (9/17/04), BACT	Federally Enforceable
CO	1.2	A-506-70-F-A (9/17/04), BACT	Federally Enforceable

J. Emissions from Presses #3, #5, #6, #7, and #8 shall vent to a thermal oxidizer (either RTO #1 or RTO #2) that will achieve no less than 97.5% destruction of VOC from the dryers based on 1000 ppmv or higher VOC inlet measured as propane at actual air stream conditions. If the inlet VOC content is below

1000 ppmv, the VOC outlet shall not exceed 25 ppmv at actual stack conditions. Dingley shall demonstrate compliance with the destruction efficiency for RTO #2 and RTO #1 by stack testing each by September 26, 2007 and once every two years thereafter. After two sets of successful compliance demonstrations, Dingley may apply to reduce the frequency of stack testing required. [A-506-70-F-A (9/17/04), BACT]

- K. RTO #1 and RTO #2 shall each maintain a temperature of at least 1300°F or the temperature which successful stack testing demonstrates a destruction efficiency of at least 97.5%. Compliance shall be demonstrated by thermocouples maintained in the incinerator chambers. The thermal oxidizer control systems shall be equipped with interlocks which shut down the presses if the temperature drops below 1300°F. The temperature shall be recorded daily by operators. [A-506-70-F-A (9/17/04), BACT]
- L. Dingley shall not operate more presses at any one time than the RTO(s) in operation can accommodate by design. The RTO system shall include interlocks that will either shut down presses or not allow start up of more presses that the operating RTO(s) can accommodate by design. Dingley shall maintain records which demonstrate which presses are in operation for all periods of time when only one RTO is in operation. [A-506-70-F-A (9/17/04), BACT]
- M. Compliance with particulate matter limits for the catalytic incinerator, RTO #1, and RTO #2 shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Method 5 upon request by the Department. [A-506-70-F-A (9/17/04), BACT]
- N. Visible emissions from the presses, RTO #1, RTO #2, and the catalytic incinerator shall each not exceed 10% opacity on a six minute block average basis. [A-506-70-F-A (9/17/04), BACT]

**(16) Facility Wide Emission Limits**

- A. Facility wide emissions of VOC from the facility shall not exceed 94.4 ton/year, based on a 12-month rolling total. Dingley shall maintain monthly records to demonstrate compliance with this limit. [A-506-70-F-A (9/17/04), BACT]
- B. Facility wide emissions of HAPs listed in Section 112(b) of the Clean Air Act shall not exceed 9.9 ton/year for any single HAP and 24.9 ton/year for all HAPs combined, both based on a 12-month rolling total. Dingley shall



maintain monthly records to demonstrate compliance with this limit.  
[A-506-70-A-I (2/28/01), BPT]

- (17) Documentation of VOC and HAP emissions for Dingley shall utilize the following six assumptions when calculating monthly emissions [A-506-71-H-A (1/13/98), BPT]:

1. 70% of the fountain solution flash off in the dryer.
2. 40% of the machine applied blanket wash flashes off in the dryer.
3. 20% of the VOCs and HAPs in the ink are retained in the substrate.
4. The remaining 80% of the VOCs and HAPs in the ink flash off in the dryer.
5. 100% of the remaining VOCs and HAPs, that are not shipped off-site as hazardous waste, are emitted.
6. VOC destruction efficiencies for the catalytic incinerator, RTO #1, and RTO #2 are to be based on either stack test results or factors approved by the Department.

(18) **Bindery/Ink Jet Operations**

Dingley shall use solvent recovery systems on all but two of its methanol ink jet printers. [A-506-70-F-A (9/17/04), BACT]

(19) **Parts Washer**

Parts washers that use a solvent degreaser containing greater than 1% VOC are subject to the operational and record keeping requirements of MEDEP Chapter 130 which include, but are not limited to, the following:

- A. Dingley shall keep records of the amount of solvent added to each parts washer. [MEDEP Chapter 130]
- B. Dingley shall equip each cold cleaning degreaser unit with a cover that is easily operated with one hand if [MEDEP Chapter 130]:
  1. the solvent vapor pressure is greater than 15 millimeters of mercury measured at 100 °F by ASTM D323-89; or,
  2. the solvent is agitated; or,
  3. the solvent is heated.

- C. Dingley shall attach a permanent conspicuous label to each cold cleaning degreaser unit summarizing the following operational standards [MEDEP Chapter 130]:
  - 1. Close the covers on all solvent degreasing tanks when the tanks are not in use;
  - 2. Drain the cleaned parts for at least fifteen (15) seconds or until dripping stops;
  - 3. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized or shower-type spray) at a pressure that does not exceed ten (10) pounds per square inch gauge pressure (psig);
  - 4. Do not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
  - 5. Minimize drafts to less than 40 meters/minute; and
  - 6. Refrain from operating the cold cleaning degreaser upon the occurrence of any visible solvent leak until such leak is repaired.
- D. Dingley shall not use any halogenated solvents in the degreasing tanks. [MEDEP Chapter 140, BPT]
- E. For those degreasers containing less than 1% VOC, Dingley shall keep the degreasers' Material Safety Data Sheets (MSDS) on file. [MEDEP Chapter 140, BPT]

(20) **Monitoring and Recordkeeping Requirements**  
[MEDEP Chapter 140, BPT]

- A. The following are identified as Periodic Monitors:
  - 1. Facility natural gas fuel use.
  - 2. Chamber temperature for the catalytic incinerator, RTO #1, and RTO#2.
  - 3. Date and time of all downtime for RTO #1 and RTO#2.
  - 4. Which presses are in operation during all periods of downtime for RTO#1 and RTO#2.
  - 5. Maximum design flow rate for all presses in operation during all periods of downtime for RTO #1 and RTO #2.
  - 6. Amount of ink, fountain solution, and blanket wash used in both the printing and inkjet/video jet operations.
  - 7. VOC and HAP content of the ink, fountain solution, and blanket wash used.
  - 8. Record keeping as required by MEDEP Chapter 130 for the parts washer.
- B. The following are identified as CAM monitors [40 CFR Part 64]:
  - 1. Chamber temperature for the catalytic incinerator, RTO #1, and RTO #2.
  - 2. Maximum design flow rate from the presses to the RTOs.

(21) **Compliance Assurance Monitoring**

A. VOC CAM for the Catalytic Incinerator [40 CFR Part 64]

Condition	Indicator #1: Catalytic Incinerator Combustion Chamber Temperature
1. Measurement Method	Dingley shall monitor the Catalytic Incinerator combustion chamber temperature with a thermocouple.
2. Indicator Range	The Catalytic Incinerator combustion chamber temperature shall be maintained above 600°F. If the temperature drops below this threshold, it is considered an excursion and the system is shut down until the problem is identified and repairs are completed. The excursion is reported.
3. Data Representativeness	The thermocouple shall be installed in the combustion chamber per manufacturer's design. Thermocouple shall be accurate within $\pm 10^\circ\text{F}$ .
4. QA/QC	Inspections of the Catalytic Incinerator, including thermocouples, are performed per the manufacturer's specifications, but not less than once per 12 month period.
5. Monitoring Frequency	Dingley shall measure the Catalytic Incinerator combustion chamber temperature continuously.
6. Data Collection Procedure	Temperature is recorded on a log once per shift.
7. Averaging Period	none

B. VOC CAM for RTO #1 and RTO #2 [40 CFR Part 64]

Condition	Indicator #1: RTO #1 Combustion Chamber Temperature
1. Measurement Method	Dingley shall monitor the combustion chamber temperature of RTO #1 with a thermocouple.
2. Indicator Range	The combustion chamber temperature of RTO #1 shall be maintained above 1300°F. If the temperature drops below this threshold, it is considered an excursion and the system is shut down until the problem is identified and repairs are completed. The excursion is reported.
3. Data Representativeness	The thermocouple shall be installed in the combustion chamber per manufacturer's design. Thermocouple shall be accurate within $\pm 10^\circ\text{F}$ .
4. QA/QC	Inspections of RTO #1, including thermocouples, are performed per the manufacturer's specifications, but not less than once per 12 month period.
5. Monitoring Frequency	Dingley shall measure RTO #1's combustion chamber temperature continuously.
6. Data Collection Procedure	Temperature is recorded continuously on a chart recorder with a minimum sensitivity of $<10^\circ\text{F}$ .
7. Averaging Period	none

Condition	Indicator #2: RTO #2 Combustion Chamber Temperature
1. Measurement Method	Dingley shall monitor the combustion chamber temperature of RTO #2 with a thermocouple.
2. Indicator Range	The combustion chamber temperature of RTO #2 shall be maintained above 1300°F. If the temperature drops below this threshold, it is considered an excursion and the system is shut down until the problem is identified and repairs are completed. The excursion is reported.
3. Data Representativeness	The thermocouple shall be installed in the combustion chamber per manufacturer's design. Thermocouple shall be accurate within $\pm 10^\circ\text{F}$ .
4. QA/QC	Inspections of RTO #2, including thermocouples, are performed per the manufacturer's specifications, but not less than once per 12 month period.
5. Monitoring Frequency	Dingley shall measure RTO #2's combustion chamber temperature continuously.
6. Data Collection Procedure	Temperature is recorded continuously on a chart recorder with a minimum sensitivity of $<10^\circ\text{F}$ .
7. Averaging Period	none

Condition	Indicator #3: Maximum Potential Gas Flow Rate
1. Measurement Method	Dingley shall monitor which presses are in operation for any and all instances of RTO downtime.
2. Indicator Range	For instances when only one RTO is operational, the total maximum flow rate from the operating presses should not exceed the maximum design flow rate of the operational RTO. If the total maximum potential flow rate of the operating presses exceeds the maximum capacity of the operations RTO, presses shall be shut down until this requirement is met. The excursion is reported.
3. Data Representativeness	By using the maximum design flow from the presses, the total flow to the RTO is conservatively overestimated.
4. QA/QC	If the records are collected electronically, annual inspections of the data collection system shall be performed.
5. Monitoring Frequency	The list of presses in operation shall be kept for all instances of RTO downtime. During that time the list shall be updated continuously. (Minimum of once per 15 minutes)
6. Data Collection Procedure	The list of presses in operation shall be kept either by manual entry or by automated data collection.
7. Averaging Period	none

- C. Dingley shall operate and monitor the Catalytic Incinerator, RTO #1, and RTO #2 within the ranges established by their CAM plan. Prior to making any changes to the approved CAM plan, Dingley shall notify the Department and, if necessary, submit a proposed modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. [40 CFR 64.7.e]
- D. Upon detecting an excursion, Dingley shall restore normal operation of the control equipment as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. [40 CFR 64.7.d]
- E. In addition to the requirements of Standard Condition (10), any excursions shall be reported on semiannual reports. If excursions occur, Dingley must also certify intermittent compliance with the emission limits for the control device monitored on their annual compliance certification. [40 CFR 64]

(22) **Semiannual Reporting**

The licensee shall submit semiannual reports every six months to the Bureau of Air Quality. The semiannual reports are due on July 31<sup>st</sup> and Jan 31<sup>st</sup> of each year. The semiannual report shall be considered on-time if the postmark of the submittal is before the due date or if the report is received by the DEP within seven calendar days of the due date.

- A. Each semiannual report shall include a summary of the periodic monitoring required by this license.
- B. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.

[MEDEP Chapter 140]

(23) **Annual Compliance Certification**

Dingley shall submit an annual compliance certification to the Department in accordance with Standard Condition (13) of this license. The initial annual compliance certification is due January 31 of each year.

The annual compliance certification shall be considered on-time if the postmark of the submittal is before the due date or if the report is received by the DEP within seven calendar days of the due date. Certification of compliance is to be based on the stack testing or monitoring data required by this license. Where the license does not require such data, or the license requires such data upon request of the Department and the Department has not requested the testing or monitoring, compliance may be certified based upon other reasonably available information such as the design of the equipment or applicable emission factors.

[MEDEP Chapter 140]

(24) **Annual Emission Statement**

In accordance with MEDEP Chapter 137, the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of:

- A. A computer program and accompanying instructions supplied by the Department;
- or

- B. A written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions should be directed to:

Attn: Criteria Emission Inventory Coordinator  
Maine DEP  
Bureau of Air Quality  
17 State House Station  
Augusta, ME 04333-0017

Phone: (207) 287-2437

The emission statement must be submitted no later than July 1 or as otherwise specified in Chapter 137.

[MEDEP Chapter 137]

**(25) Air Toxics Emissions Statement**

If Dingley exceeds the thresholds for HAPs listed in Appendix A of MEDEP Chapter 137 in an inventory year, in accordance with MEDEP Chapter 137 the licensee shall report, no later than July 1 every three years (2005, 2008, 2011, etc.) or as otherwise stated in Chapter 137, the information necessary to accurately update the State's toxic air pollutants emission inventory by means of a computer program supplied by the Department or a written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions should be directed to:

Attn: Criteria Emission Inventory Coordinator  
Maine DEP  
Bureau of Air Quality  
17 State House Station  
Augusta, ME 04333-0017

Phone: (207) 287-2437

[MEDEP Chapter 137]

(26) **General Applicable State Regulations**

The licensee is subject to the State regulations listed below.

<u>Origin and Authority</u>	<u>Requirement Summary</u>	<u>Enforceability</u>
Chapter 102	Open Burning	-
Chapter 109	Emergency Episode Regulation	-
Chapter 110	Ambient Air Quality Standard	-
Chapter 116	Prohibited Dispersion Techniques	-
38 M.R.S.A. §585-B, sub-§5	Mercury Emission Limit	Enforceable by State-only

(27) **Units Containing Ozone Depleting Substances**

When repairing or disposing of units containing ozone depleting substances, the licensee shall comply with the standards for recycling and emission reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioning units in Subpart B. An example of such units include refrigerators and any size air conditioner that contain CFCs.

[40 CFR, Part 82, Subpart F]

(28) **Asbestos Abatement**

When undertaking Asbestos abatement activities, Dingley shall comply with the Standard for Asbestos Demolition and Renovation 40 CFR Part 61, Subpart M.

(29) **Certification by a Responsible Official**

All reports (including quarterly reports, semiannual reports, and annual compliance certifications) required by this license to be submitted to the Bureau of Air Quality must be signed by a responsible official. [MEDEP Chapter 140]



(30) **Annual Fee**

Dingley shall pay the annual air emission license fee within 30 days of October 31<sup>st</sup> of each year. Pursuant to 38 M.R.S.A. 353(A), failure to pay this annual fee in the stated timeframe is sufficient grounds for revocation of the license under section 341-D, subsection 3.

DONE AND DATED IN AUGUSTA, MAINE THIS                      DAY OF                      2006.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: \_\_\_\_\_  
DAVID P. LITTELL, COMMISSIONER

**The term of this license shall be five (5) years from the signature date above.**

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 8/26/05

Date of application acceptance: 8/26/05

Date filed with the Board of Environmental Protection: \_\_\_\_\_

This Order prepared by Lynn Ross, Bureau of Air Quality.